

Amy S. Young, Esq.
CWA Legal Department
275 Seventh Avenue, Suite 2300
New York, NY 10001

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
BARBARA BRYANT,	:
	:
	:
Plaintiff,	:
	:
-against-	:
	:
VERIZON COMMUNICATIONS, COMMUNICATIONS	:
WORKERS OF AMERICA LOCAL 1103 and	:
COMMUNICATIONS WORKERS OF AMERICA,	:
	:
Defendants.	:
	:
-----X	

05 Civ. 8112 (CM)

UNION DEFENDANTS' PROPOSED VOIR DIRE FOR THE JURY

In addition to the normal questions of age, marital status and present and formal occupations and residences, defendants CWA and Local 1103 wish to make the following inquiries of members of the venire:

1. How long have you worked at your present job?
2. What is your job title and what responsibilities and duties does your job entail?
3. Have you, your family, and/or your friends ever had dealings with labor unions?
 - 3a. [If yes,] how did that experience affect you?
 - 3b. Given that we are all conditioned by our life experiences, do you think you can listen to testimony about a union-related matter and still render a decision based only on the facts that are put before you during the trial?

4. Are you or have you ever been a member of the Communications Workers of America, AFL-CIO?
5. Do you have family members or friends who are or have been members of the Communications Workers of America, AFL-CIO?
6. Are you a non-member employee in a collective bargaining unit represented by the Communications Workers of America, AFL-CIO, or any other labor union?
7. What organizations do you belong to?
 - 7a. Are you an active member?
 - 7b. If so, what activities do you engage in?
8. Have you ever worked for the telephone company?
9. Do you have friends or family that are telephone company employees?
10. We've all had some hassles with the telephone company such as billing problems or a missed appointment here and there. Putting those aside (as you must to do your duty as jurors) have you ever had any major problems with the telephone company?
11. Have you ever been fired from a job?
12. Have you ever been demoted against your will?
13. Have you ever done any contracting for the telephone company?

Dated: New York, New York
January 11, 2008

Respectfully submitted,

Amy S. Young (ASY5547)
CWA Legal Department
275 Seventh Avenue, Suite 2300
New York, New York 10001
(212) 419-1550 (voice)
(212) 419-1555 (fax)